

11-13-08

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

---- In the Matter of ----

) Docket No. 2008-0273
)

PUBLIC UTILITIES COMMISSION
)
)

Instituting a Proceeding to Investigate the
Implementation of Feed-in Tariffs
)
)

FILED

NOV 12 2008

Public Utilities Commission

MOTION TO INTERVENE

OF

HAWAII RENEWABLE ENERGY ALLIANCE

AND

CERTIFICATE OF SERVICE

Warren S. Bollmeier II, President
Hawaii Renewable Energy Alliance
46-040 Konane Place 3816
Kaneohe, HI 96744

(808) 247-7753
wsb@lava.net

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I. INTRODUCTION

The Hawaii Renewable Energy Alliance ("Movant") hereby moves the Hawaii Public Utilities Commission for an order allowing Movant to intervene as a party in the instant docket.

II. MOTION TO INTERVENE OF THE HAWAII RENEWABLE ENERGY ALLIANCE

BACKGROUND

The Hawaii Renewable Energy Alliance (HREA) is a Hawaii-based, private, non-profit corporation, exempt from federal income tax under Section 501(c)(6) of the Internal Revenue Code of 1986, composed of developers, manufacturers, distributors, scientists, engineers, and advocates in renewable energy. Individual HREA members were intervenors in the Commission's Docket No. 94-0226 (Renewable Energy) and in the first three rounds of HECO's IRP, including the Externalities Working Group, Supply-Side and DSM Advisory Committees. HREA is a current member of the Advisory Groups for both HECO fourth round and MECO third round IRPs, and HREA is an intervenor in Docket No. 99-0004 (MECO IRP – 2000 to 2020), which is MECO's third round IRP, and HECO IRP-4 (No. 2007-0084).

HREA was an intervenor in Commission's dockets on Electric Competition (No. 96-0493), Distributed Generation (No. 03-371), Competitive Bidding for New Generation (No. 03-372), Demand-Side Management/Energy Efficiency (No. 05-0069). HREA is currently an intervenor on the following dockets: HECO DG Tariffs (No. 2006-0497), KIUC DG Tariffs (No. 2006-0498), Net Metering (No. 2006-0084), PAYS® (No. 2006-0425), and the Public Benefits Fund (2007-

0323), RPS (2007-0008), Renewable Energy Infrastructure Surcharge Program (No. 2007-0416). Planning for and implementing renewables are an important part of the objectives and discussion in each of these dockets.

Accordingly, the HREA has a substantial and continuing interest in the subject of renewables in the electric utility sector. Regarding the instant docket, HREA's interests extend directly to the encouragement of renewable electricity via feed-in tariffs. HREA believes that *properly-designed and properly-implemented* feed-in tariffs offer specific benefits to the state. For example, there is potential to: (i) accelerate greatly the implementation of renewable energy resources on the HECO family utility systems, not only meeting but easily surpassing our state's current RPS requirements, (ii) increasing our energy security, and (iii) supporting the Hawaii Clean Energy Initiative/s goal of 70% clean energy by 2030.

ARGUMENT

Pursuant to Hawaii Revised Statutes Section 269-6 and Sections 6-61-41 and 6-61-55, Rules of Practice and Procedure before the Public Utilities Commission, Chapter 61, of Title 6 of the Hawaii Administrative Rules, Movant states the following in support of its motion:

1. **Nature of Movant's Statutory or other Right to Participate in this Proceeding.**

By opening this Docket, the Public Utilities Commission has invited any interested individual, entity, agency or community or business organization to file a motion to intervene in this docket or to participate without intervention. Movant is an "organization" within the meaning of the invitation.

2. **The Nature and Extent of the Applicant's Property, Financial, and Other Interest in the Pending Matter.**

Movant's member organizations and individuals are companies, consultants or agents involved in and/or considering manufacturing, marketing, selling, installing and maintaining renewables in Hawaii, and are concerned about access to the electricity market, including appropriate and reasonable terms and conditions in power purchase agreements. Accordingly, there are substantial financial and other interests implicated in this docket.

3. Effect of Pending Order upon Movant's Interest.

See #2 above.

4. Other Means by Which the Movant's Interest may be Protected.

None.

5. Extent to Which Movant's Interest will be Represented by Other Parties.

None. For example, the utilities and the Consumer Advocate cannot adequately represent the interests of HREA and its individual members.

6. Extent to Which Movant Can Assist in the Development of a Sound Evidentiary Record.

HREA will provide the resources, including professional expertise and time, necessary for effective representation, and to assist in the development of a sound evidentiary record.

7. Extent to Which Movant's Participation will Broaden the Issues or Delay the Proceeding

None.

8. Extent to Which Movant's Interest from the General Public

See #2 above.


9. Whether the applicant's position is in support of or in opposition to the relief sought

HREA is interested in working with the other parties and participants (if any) to resolve issues in the instant docket. We anticipate the result will provide overall benefits to the state, including the potential to increase greatly the rate of implementing new renewable projects in Hawaii, thereby increasing our energy security, supporting our state goal to reduce our dependence on imported energy, as now embodied in the Hawaii Clean Energy Initiative, and hopefully, helping to stabilize energy bills in the near term and lowering them in the future.

CONCLUSION

Based on the foregoing, Movant respectfully requests that the Commission grant Movant's Motion to Intervene.

DATED: November 13, 2008, Honolulu, Hawaii



President, HREA

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Motion to Intervene upon the following parties by causing a copy hereof to be hand-delivered or mailed, postage prepaid and properly addressed to each such party:

CATHERINE P. AWAKUNI, EXECUTIVE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER
AFFAIRS
DIVISION OF CONSUMER ADVOCACY
P. O. Box 541
Honolulu, HI 96809

DARCY L. ENDO-OMOTO, VICE-PRESIDENT
GOVERNMENTAL AND COMMUNITY AFFAIRS
HAWAIIAN ELECTRIC COMPANY INC
P. O. Box 2750
Honolulu, HI 96840-0001

DEAN MATSUURA
DIRECTOR, REGULATORY AFFAIRS
HAWAIIAN ELECTRIC COMPANY, INC.
P. O. Box 2750
Honolulu, Hawaii 96840-0001

JAY IGNACIO
PRESIDENT
HAWAII ELECTRIC LIGHT COMPANY, INC.
P. O. Box 1027
Hilo, HI 96721-1027

EDWARD L. REINHARDT
PRESIDENT
MAUI ELECTRIC COMPANY, LIMITED
P. O. Box 398
Kahului, HI 96732

RANDALL J. HEE, P.E.
PRESIDENT AND CEO
KAUAI ISLAND UTILITY COOPERATIVE
4463 Pahe'e Street, Suite 1
Lihue, Hawaii 96766-2000

Date: November 13, 2008



President, HREA